

# **BLANCHARD FOREST STRATEGIES GROUP**

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“Consensus Recommendations and Points of Agreement,”  
and  
“Additional Recommended Management Directions”

## **Summary of Public Comments Received**

Presented to  
Commissioner of Public Lands Doug Sutherland

March 20, 2007



WASHINGTON STATE DEPARTMENT OF  
**Natural Resources**  
Doug Sutherland - Commissioner of Public Lands

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# Blanchard Forest Overview

Blanchard Forest is comprised of 4,827 acres of forested state trust lands managed by the Washington State Department of Natural Resources (DNR). The forest is centered on the southern-most mountain of the majestic Chuckanut Range, just south of the Skagit/Whatcom county line, representing a coastal forest in a unique community setting that is rapidly urbanizing. Blanchard Forest has valued ecological and recreational qualities as well as significant timber production potential that helps fund Skagit County services, local education, and contributes to the local natural resource-based economy.

Ten members of the local community and a DNR representative were appointed by Commissioner of Public Lands Doug Sutherland as the Blanchard Forest Strategy Group (Strategies Group) to help the Department develop a long-term management strategy for Blanchard Forest. The local members represent Skagit County (as a trust beneficiary), recreation interests, conservation groups, land use organizations, and the timber industry. The Strategies Group developed a set of recommendations that will be proposed to Commissioner Sutherland and the DNR on March 20, 2007.

The set of recommendations entitled, “Consensus Recommendations and Points of Agreement” and “Additional Recommended Management Directions”, was shared with the public on February 12, 2007, at an ‘Open House’ and on the DNR website. At this event, attendees were encouraged to submit written comments on the recommendations by February 28<sup>th</sup>, 2007. (Comments were actually accepted through March 6<sup>th</sup>, 2007). This document represents a summary of those comments.

Comments submitted centered on four key areas: 1) the Blanchard Forest Strategy Group Recommendations as a whole, 2) specific components of the recommendations, 3) specific resource concerns on Blanchard, and 4) the composition of the Group itself or its decision-making process.

For tracking purposes, DNR converted all comments, in their entirety, into a digital format and assigned an alphanumeric code (see appendix) to each comment received. The comments were sorted and coded according to how they were submitted, including by letter, (L), e-mail (EM), and comment cards from the February 12, 2007 public meeting (CC). Next, DNR staff examined each comment and attempted to identify which component(s) of the recommendations that the author addressed. Finally, DNR staff identified the author’s particular opinions about each component, grouped them with other similar opinions, and then summarized these opinions, using selected representative quotations from the comments. In order to understand a particular quotation in the context of an entire letter, email or comment card, the comments themselves, in their entirety, have been attached as an appendix to this document.

This summary will not speculate as to whether any of the opinions articulated in the comments represent a certain quantity of opinions, such as the “majority” or “minority” opinion. Instead, it is an attempt to collect all of the issues raised in the comments and present them to the Commissioner to review.

## **Total Number of Comments Received Regarding Blanchard Forest**

### **Comments Submitted by March 6, 2007**

Total Number of Comment Cards	84
Total Number of Letters	11
Total number of Emails Submitted	62

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<b>TOTAL SETS OF COMMENTS</b>	<b>157 (Includes some corresponding more than once)</b>
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<b>Total Number of February 12, 2007 Public Meeting Attendees Who Signed In</b>	<b>128</b>
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<b>Estimated Number of Public Meeting Attendees</b>	<b>135</b>
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# **1. Blanchard Forest Strategy Group Recommendations**

Blanchard Forest Strategy Group recommendations, as a whole, elicited a range of reactions in comments, from unwavering support to vehement rejection. Among those who endorsed the recommendations, there were those who expressed “strong support” as well as those who offered reluctant acceptance. Still others offered conditional support, based on additions to the recommendations, such as designing management plans for Blanchard that would allow for increasing the size of the Core Zone at some point in the future. Those who objected to the recommendations expressed a range of reasons for dissatisfaction, including problems with the language within the recommendations, inadequate size determination for Core Zone, disproportionate weight of some interests over others, and neglecting to present alternative solutions.

## **Supports Recommendations as a Whole**

Supporters described the recommendations as: “making sense”; understanding that “balance [is] needed”; “fought and well-thought”; “the best that could come out of such a diverse group”; “[proving] that we can work together to help protect our land and our way of life”; and the “right solution for our future as areas such as these are essential for our upcoming generations.” Some who expressed their support stated that they value compromise, saying that the recommendations show “willingness to work together” and that “all sides agreeing across the table on an environmental issue, like Blanchard Mt. development, is significant, democratic and healthy progress.” Others offered that the recommendations served as an important response to development pressures, citing that “urbanization/growth are an issue, working forest is solution” and that expanding public ownership in the area is important, “acquisition of private timber lands or conservation rights ... is important to maintain a working forest in the Chuckanut Mountains.” Many commenters saw their interests and values, including allowing for different types of public use, wildlife values, and expanding open space, reflected in the recommendations.

Many of those who expressed support for the recommendations stated that they wished the area of the Core Zone was larger or that the entire Blanchard Forest was protected. Many of these commenters explained that in spite of these concerns, they were lending their support to the recommendations mainly because they balanced competing interests. They said the recommendations “provide absolute protection from logging for as much of these lands as possible. If this is the best we can do then so be it.” Others said that they represented “an acceptable compromise”, the “best solution put forward considering the threat to the area”, the “best strategy to balance the logging and recreational interests of this area”, a “fair compromise for all involved”. Still others said that the “compromise that was reached is a very good one”, and it “represents a well-reasoned and sincere compromise among representatives of several widely diverse interest groups.” Some said that they supported the recommendations because the commenter “understand[s] more of the considerations involved and appreciated the effort to set aside 1,600 acres.”

There were those who expressed support if the Commissioner allowed flexibility in the future management of Blanchard to expand the size of the Core Zone “if future conditions warrant it”

or if “increased recreation use, wildlife management needs, and/or forest science indicate that such additional conservation would be in the best public interest.”

## **Does Not Support Recommendations as a Whole**

Comments that did not support the Blanchard Forest Strategy Group’s recommendations expressed a range of opinions from unimpressed to strong opposition. Reasons for rejection included problems with the language within the recommendations, inadequate size determination for Core Zone, disproportionate weight of some interests over others and neglecting to present alternative solutions.

Some comments extended general criticism, characterizing the recommendations as “unacceptable” or “having “major shortcomings.” Others held specific problems with the recommendations, such as viewing the language of the document as unclear, describing them as “full of loop-holes”, “wholly inadequate”, and characterized by “vagueness and short-sightedness.” A third group of remarks withheld support from the recommendations because they did not include provisions to set all of Blanchard Forest aside from timber harvest.

Another group held the opinion that the recommendations valued specific interests, such as logging, over others. They described the recommendations as “a giveaway of public land to logging interests”, “inappropriately influenced by logging interests and short-term gain” where the “the ecological and recreational public interests were not proportionally represented...” These comments described the recommendations as presenting “well-defined timber harvest goals and road construction plan, utilizing designated zones of various harvest methods, yet with poorly defined public access and use, and minimal protected habitat...”

A final set of remarks identified a lack of alternatives in the recommendations as a basis for dissatisfaction, mentioning that “other long-term sustainable working-forest management options were not duly deliberated” and “different long-term strategies for public school funding have not been seriously explored.”

## **2. Specific Components of the Recommendations (I-IV and Management Overlays)**

### **Recommendation I. Manage Blanchard Forest according to Four Management Zones and Two Management Overlays with Appropriate Management Emphasis**

Comments examining “Recommendation I.” presented concerns about the definition of the Core Zone as well as suggested several harvesting restrictions for the General Management Zone. Other opinions discussed plant and wildlife habitat protection, including conveying a need for more scientific information, expressing concern over the impact of forest management on plant and wildlife habitat, noting that forest management creates habitat, urging that invasive species management be addressed and finally suggesting changes for the gene pool reserve.

### **Core Size**

Commenters expressed a range of opinions about the area and boundaries of the core zone. Please see “Additional Recommended Management Directions” for more information.

### **Core Zone Definition is Unclear**

A commenter expressed confusion over the definition of a Core Zone, that “The plan calls for this zone to be ‘managed in a manner similar to a permanently protected ‘Natural Resource Conservation Area’ (NRCA) and then goes on to describe under Management Directions, thinning and other ‘ecological management’ techniques to hasten the development of late-successional forest. Management without roads is followed by an allowance for roads. This is all very confusing and devalues the plan overall as apparent double-speak.”

### **Restrict Harvesting in General Management Zone**

Remarks on the General Management Zone included calls for restricting harvesting in the General Management Zone in a variety of ways including suggestions that “selective cutting be done between Oyster Dome and British Army Trail rather than regeneration (clear cutting)” to “preserve the aesthetic view of Mt. Baker from Oyster Dome and the British Army trail” and keeping “the steepest westside slopes with the oldest trees and greatest concentration of snags remain permanently off –limits to timber generation.” Another suggested that “no logging practices should occur 1,000 feet up and from end to end of the shorelines.” Others conveyed that they would like the DNR to slow their harvest schedule or restrict “logging on Blanchard to the south and eastern most areas for 5-10 years to allow conservationists the opportunity to expand the core protected area.” Comments encouraged the DNR to “demonstrate good faith by focusing near-term logging on areas that are not under major contention. This will ensure that citizens retain the opportunity to protect these lands in the future.” Finally another commenter argued that the proposed 2% annual harvest was an “aggressive plan that does not appear to be sustainable given the current land base” saying that “it is unclear what this harvest goal is based on, what is driving it, or what previous harvest levels were attained for comparison.”

### **Plant & Wildlife Protection is Adequate**

Some comments stated that the Recommendations provide adequate protection for plant and wildlife species: “it is the best solution to protecting the last vestiges of coastal forest in the upper Puget Sound” and it “considers keeping habitat in place over the next century through important habitat protections for rare plants and animals, streamside forests, and slopes highly visible from Chuckanut Drive and other viewpoints, as well as managing for older forest conditions, providing an experience similar to an ‘unmanaged forest’.”

### **More Scientific Information on Plants and Wildlife Needed**

Other comments conveyed that more scientific information on plants and wildlife in Blanchard Forest is needed to inform the Strategies Group’s recommendations. Most expressed a need for a “comprehensive, unbiased” scientific assessment while others offered that a “biodiversity study” would be more useful to “contribute essential information.” Some opined that such an assessment should be conducted before DNR harvests any timber: “Planning for multiple uses on Blanchard Mountain is only as effective as the baseline information available.” One comment listed the type of information needed for such an assessment, including “area allocations to protected vs. harvested designations, spatial configuration of those designations, corridor widths,



locations, and alignments, conservation of sensitive species and habitats, or regional impacts...a credible plan would require reference to a comprehensive environmental assessment and include provisions to protect important environmental elements identified in such an assessment.”

### **Habitat Conservation Plan (HCP) is Inadequate**

One set of remarks offered that HCP protections are inadequate because they “only address those species and habitats associated with or identified under the Endangered Species Act” resulting in a set of recommendations that “does not address or provide protection for the whole biological community or biodiversity of Blanchard Mountain.”

### **Concerns about Forest Management and its Impact on Plant & Wildlife Habitat**

Some expressed uneasiness over the impact of forest management on plant and wildlife species: “Looking at your maps, your buffer zones are too small to protect the water ways...”; “hiking clearcuts...it’s not just a selfish thing. It’s seeing the loss of habitat, displaced wildlife, etc. that makes it wrenching”; and “I am very concerned about the impact of even-aged timber management and new roads and how those actions can adversely impact the concentration of eagles and owls in the area.”

### **Supports Forest Management and Its Positive Impact on Plant and Animal Habitat, Gene Pool, and Concerns over Invasive Species**

One remark proposed the idea that “harvested areas provide habitat for some species.” Others warned about invasive species “can’t someone suggest a solution to the invasive holly and ivy that plagues even the deep woods where there’s water?” Finally, a commenter suggested that the area marked as “gene pool” on the map is “fairly young and of even age. Perhaps different locations with other-aged stands should be set aside for gene-pool purposes.”

### **Management Overlays**

**“Overlay 1. A future recreational overlay will be developed for trails and other recreational uses that provide multiple recreational experiences in each of the management zones but does not reduce the net area available for timber production within the general management or high visual sensitivity zone.”**

Under “Recommendation I”, the Strategies Group recommendations include “Management Overlays.” Many of the comments on the recommendations addressed each of the overlays. For “Overlay 1”, which is recreational and which will be developed for trail and other recreational uses, comments expressed support for including multiple types of public use. These comments were interpreted as proposing that this overlay include all recreation uses when it is developed. Some comments expressed concern about the impact of recreation on wildlife while others expressed concern about the impact of harvesting activities and roads on trails.

### **Supports Different Recreation Uses**

Comments supporting the different types of recreational uses include: “keep Blanchard Mountain to all non-motorized groups”; “keep the trails open for livestock use”; and “recognize hang gliding as having a low negative impact and a significant positive impact on the land and the community.”

### **Recreation, Roads and Harvesting Have Negative Impacts on Wildlife and Trails**

Concerns about the impact of recreation primarily centered on the caves or talus slopes, an area on Blanchard Mountain believed to contain significant bat habitat. One asked “What is being done to manage the recreational impact? For example, people are allowed in the bat caves all year, what about the bats?” Others expressed concern that other sensitive wildlife habitat will be negatively impacted by recreation, harvesting or road construction: “It is also important that certain sensitive habitat areas not be harvested, thinned or accessed by roads or even recreationalists. A substantial new road system to support forest access and harvest, even within the core, appears to be a priority in the plan. Impacts caused by roads, disturbance, drainage issues, road location and maintenance are all issues that are not addressed. Environmental and ecological impacts caused by roads can be extreme and unnecessary. The proposed road system did not appear on the map and needs to be fully disclosed to the public for review and discussion. Again, the Blanchard Forest Plan represents a forest-harvest-centric plan.” Remarks addressing harvesting and roads impact on trails include the comment that “the very extensive trails in the area will be destroyed by roads and clear cuts.”

**“Overlay 2. A future demonstration working forest overlay will be developed that emphasizes natural resource stewardship, the role of State Forest trust lands and the enduring values of a working forest in an urban setting.”**

Other remarks address “Overlay 2.” which includes the development of a future demonstration working forest. Some suggested that Burlington-Edison High School should be involved in such an effort: “now’s [sic] the time for BEHS to get on board and integrate the compromise solution into the curriculum and school activities”. Others underscored the need for education on natural resource stewardship and the role of State Forest trust lands: “If we had better education on the value of commercial timber lands, we would not be here tonight”; and “more effort and education could be put into the benefits of logging both sustainable and clear cut.” Finally, one commenter suggested that “informative nature trails” would be helpful.

### **Recommendation II. Support maintaining working forests and securing sustainable timber supply in Skagit and Whatcom Counties using a variety of tools consistent with local Growth Management policies (RCW 36.70A).**

Remarks addressing “Recommendation II” generally supported protections for resource lands, state acquisition of additional lands from willing landowners, and provided suggestions for replacement lands. Remarks critical of the recommendation conveyed that securing a sustainable timber supply in Skagit and Whatcom Counties was not a job for private citizens and that additional economic information is needed to inform the recommendations. Finally, some remarks objected to implementing federal land management plans on the Mount Baker-Snoqualmie National Forest.

## **Does Not Support Securing Sustainable Timber Supply in Skagit and Whatcom Counties**

Comments objected to “Recommendation II” overall, expressing that this is “a job for the DNR, not for private citizens who want to maintain State Lands for recreational and environmental purposes.”

## **Supports Protection for Resource Lands**

Some comments underscored the need for protecting such resource lands: “We have no net loss for critical areas and wetlands – why not no net loss for production type timber lands?”; “Preserve our rural connection to the lands. No one is more tied to the land than those who depend on it for their livelihood”; and “#1 No net loss of working forest acreage.”

## **Supports State Acquisition of Additional Lands**

Other comments endorsed the idea presented in element “A”, which states “Support state acquisition of private timber lands from willing landowners in proximity to Blanchard State Forest.” These comments included support for “the acquisition of private logging lands and/or other property on which trophy houses would otherwise sprout”. Others stated that: “One of the most important aspects of the Agreement is that its implementation would protect a larger area of working forest from encroaching suburban sprawl and conversion to other uses”; “[I] strongly support the public acquisition of now-privately-owned peripheral forest lands for a variety of public uses, including timber base”; “I strongly endorse the plan to expand public (DNR) ownership of land in the Lake Samish basin”; “The purchase of private forest lands around Blanchard Mountain makes sense and will help maintain the area’s forest base and offer additional recreational options if appropriate”; “DNR should now begin to develop a prioritized package of private land acquisitions in the vicinity of Blanchard Mountain so that any funds appropriated by the Washington Legislature can be spent expeditiously”; and “[I] applaud the Blanchard Strategies Agreement’s recommendation of expanded public ownership of timberlands. It is a way to protect part of the maturing forest on the mountain while also preventing the southward creep of Bellingham; and a way to compensate the trusts for forests held in long-term deferral on the mountain.”

## **Supports State Acquisition of Lands if Coupled with Consideration of Conservation Value of Land**

Some expressed support for acquisition of additional lands if it is coupled with a consideration of the conservation value of those additional lands, “while our main interest is obviously conservation, we believe that working forests can coexist with an ambitious regional conservation initiative and provide that critical hedge against urban sprawl, but only if we are careful in protecting the lands of highest ecological and recreational value.”

## **Suggestions for Replacement Lands**

Remarks suggested ideas for replacement lands, “consider adding the following as replacement lands, either development rights or purchase: Trillium property south of Squire Lake Park, also known as Alger Alps. This proposal is consistent with goals being discussed in the Alger Community Plan”. This commenter also advised the DNR that “replacement acres should not come from currently productive sites. Non productive USFS lands (not Finney block) should be considered for replacement.”

### **Economic Analysis on Impacts to Local Economy Needed**

Other remarks stated that an economic analysis is needed on a variety of concerns, including the benefits and impacts of a working forest on a local economy: “We need to develop an economic model that shows the benefits to the community of keeping working forest lands (jobs, etc.)”; and “no empirical economic cost-benefit analysis [is] provided with this plan.” Others would like to see an economic study that examines the benefits of not harvesting, arguing that there are “significant benefits to local economies and county tax coffers of not logging Blanchard Mountain.”

### **Does Not Support Implementing Federal Land Management Plans on the Mount Baker-Snoqualmie National Forest**

Some remarks contested element “D”, which states, “Form public and private partnerships to work with the U.S. Forest Service on implementing federal land management plans on the Mount Baker- Snoqualmie National Forest. The initial focus will be the Finney Adaptive Management Area.” Those comments state that: “there should not be issues attached to this decision process that are outside of the Blanchard Forest proper”. Others say that this element is: “outside the scope of this agreement, and is opposed”; “inappropriate and must be dropped”; “inappropriate for the agreement to address or implicate forest policy on federal lands”; and “not within the authority of the Washington Department of Natural Resources, nor in line with the desire of Washington residents...to promote increased logging on National Forests.”

### **Recommendation III. Provide Skagit County Trust Compensation.**

Comments for “Recommendation III” included support for the DNR manager-Trust Beneficiary model for managing State forest lands and concerns over managing such lands for Trust Beneficiaries. Some remarks suggested other revenue generating mechanisms.

#### **Supports Managing State Forest Lands for Trust Beneficiaries**

Some comments addressed the role of harvesting timber and compensation for Skagit County and local taxing districts. Some expressed support for “Recommendation III” of the recommendations while others did not. Supporters stated that “although I would have preferred to see a complete ban on logging on Blanchard Mountain, I understand the Department of Natural Resources’ need to generate revenues for local school districts”. Others said that the agreement “blends the continued revenue production for Skagit County services and Burlington-Edison School District, at least until badly overdue long-term sustainable revenue processes are reconsidered and restructured in the Olympia legislature. I believe other areas north of Burlington could also be brought into DNR land to compensate school land trust funds and protect against development sprawl.”

#### **Does Not Support Managing State Forest Lands for Trust Beneficiaries, such as Counties and Local Taxing Districts**

Those that objected to this part of the recommendations seemed to have four areas of concern. Some expressed that managing forests for revenue places too great a burden on forest resources: “Too many forests have been cut, too many natural resources lost”; and “why are we still funding our county services with this exhaustible resource as we have for over 100 years, as though we have an endless supply of forest?”

Others argued that the revenue to beneficiaries is too small to be worthwhile: “the dollars gained for the schools and other beneficiaries is fairly insignificant”; “the schools receive relatively little funds from logging”; “schools don’t benefit that much from the timber funds”; “the revenue that actually goes to the Burlington-Edison School District is so insignificant,”; “we can’t find another way to replace the meager financing that the proposed logging would provide to the school district and the county?”; “the majority of timber revenues generated by logging on Blanchard Mountain do not go to the Burlington-Edison School District. In fact, the revenues generated represent less than ¼ of 1% of the school district’s annual budget”; “Logging ... is unreasonable to justify continuing to fund beneficiaries at such a small percentage of their budgets”; and “The amount of money the schools and county receive from the destruction of one of our last greatest places is a pittance.”

Some objected to the recommendations portraying an “either-or” choice between schools versus Blanchard: “quit holding schools hostage in order to subsidize logging while turning our environment into a wasteland”; and “the cry to cut trees to support schools angers me. Schools need our support. Let’s cut back on road construction and put our money where our mouth is. Children will benefit more from a nearby intact forest than from the temporary, piecemeal portion of the budget that a few trees will provide.”

Finally, others expressed that the model is old and outdated: “why can’t Washington move into the 20<sup>th</sup> century and change its law concerning this State income”; “the Trust land model is outdated”; “viewing state-owned trees as bank accounts for rural areas may have made some sense in 1907—however shortsighted and selfish”; and “the law that brings money from logging to schools is antique.”

### **Mechanisms to Generate Revenue**

Some commenters provided ideas for alternative means for generating revenue, including steep recreational user fees, tapping into sales taxes and permits from recreation visitors, instituting a tax on gasoline, building a restaurant at the top of Blanchard and installing a tram to transport recreationalists to the top, and finally a donation toll between the Blanchard bridge (north of Bow) and the Whatcom Fire Station.

## **Recommendation IV. Ensure Long-term Durability of Blanchard Management Agreement**

A commenter expressed concern about future timber sales on Blanchard, asking “what guarantee does the DNR buy through this process that ensures the first timber sale put up is not challenged?”

### **Additional Recommended Management Directions**

A second component of the recommendations is included in the document entitled, “Additional Recommended Management Directions: Attachment to Map showing Core.” Comments from members of the public addressed elements listed in this document, including core size, ecological management inside the Core Zone, Roads, Blanchard Forest Advisory Committee, and Implementation.

## **Core Size**

Commenters expressed a range of opinions about the area of the Core Zone, from the current size being adequate to interest in increasing the area of the Core Zone. Some submitted requests for adjusting the Core boundaries in a variety of locations.

### **Current Core Area is Adequate**

Some comments supported the current size of the Core Zone: “I support the Blanchard Strategies Group’s recommendations to protect a 1,600 acre core that includes most of the old forest on Blanchard Mountain, a majority of the trail systems, the lakes and cliffs on the mountain's top, and a linkage to Larrabee State Park”; and “Please do not increase the amount of forest being removed from logging above the 1,600 acres already put aside. We need the revenue for our schools and jobs for our loggers.”

### **Increase Area of Core Zone**

Other remarks expressed an interest in increasing the Core Zone to a range of sizes 2,400, 2,800 acres and 4,800 acres. Reasons cited for expanding size of Core included: 1) concerns about wildlife habitat and corridors “the recreation and wildlife corridor greenery is inadequate”, “the need for beautiful natural areas for people and wildlife is going to become greater and greater”, “a wildlife haven that should be preserved intact”, “It all deserves complete protection in order to maintain habitat for living things,” “our interests lie in promoting a healthy forest that will offer our grandchildren and their grandchildren an experience of natural habitat rich with wildlife! This would involve doubling the size of the core and making the protection of the core permanent”; 2) maintaining biodiversity “It is important that there be a large enough core forest to support and preserve the diversity on the mountain”; 3) concerns about forest fragmentation “time to acknowledge our need for intact natural areas”, “serious concern for the preservation of critical remaining fragments of ecosystems”; 4) the beauty and uniqueness of Blanchard, and its connection between the Puget Sound and the Cascade Mountain range “a region that connects the Puget Sound to the North Cascade Mountains in a unique way”, “the one real place that the Cascades actually touch tidewater, it is unique”, “area is unique in connecting the Cascades to the Pacific”; 5) population growth and development pressures “Skagit County has become one of the fastest growing areas of the state. Bellingham is also nearby”; 6) its proximity to citizens of Skagit and Whatcom County “Citizens of Skagit County and others, can take a pleasant hike without first having to drive many miles to reach the mountains.” Others argued that older forests will increase in value. Some comments were against timber harvesting in general. Though they did not specifically address the Recommendations, these comments were interpreted as advocating for the increase of the core zone to cover all of the Blanchard Forest.

### **Adjust Core Boundaries**

Suggestions for adjusting Core Zone boundaries included:

- “The NW part of the designated core area (in SW section 360304 in township-range-section notation) presents an extremely narrow bridge connecting an area of preserved habitat with old growth characteristics to the main part of the core area. We feel that this narrow strip is insufficient, and leads to fragmentation of the core habitat.”
- “The entire SE corner of section 360316 [section 16 of T36R03E] should be preserved to protect the only occupied salt water Marbled Murrelet habitat in Puget Sound.”

- “I recently rode my bike down the British Army trail & it is beautiful and a great ride. I hope that it can be incorporated into the Core. At least the trail.”
- “Need a connection down to the sound on the NW side of the property.”
- “The protected old growth area north-west of Oyster Creek lies between private land and timber harvest areas. The core must be widened to the east to become an effective corridor for wildlife. Existing old growth must be preserved. Cutting in the core is unacceptable as nature is able to regenerate old growth forests and man has not proven an ability to do this. The southern-most area which has Marbled Murrelet nesting activity should be much larger than twelve acres. This is the only coastal Marbled Murrelet nesting area remaining in the Greater Puget Sound Region. Enlarging and protecting this area is vital to the survival of these birds.”
- “as much of the mature forest generally west and northwest of Lizard Lake [as possible should] be included in the Core.”
- “It is very important and not addressed in this plan, that areas of biological and ecological value be interconnected. The larger wildland cores represented by Blanchard and Larrabee State Park require a much more substantial connecting corridor than the virtually nonexistent link provided for in the agreement. Broad ecological connections north and south, and along natural corridors such as stream systems are also essential, but lacking in any detail.”

### **Ecological Management Inside Core Zone**

Comments about ecological management inside the Core Zone related to support for thinnings to accelerate late-successional forests conditions, concerns about road construction within the core, and support for designation of the Core Zone as a NRCA.

#### ***Supports Intent to Hasten the Development of Late Succession Conifer Forest***

Comments regarding ecological management inside the Core Zone included support for “light touch forestry”, “I would like to see strict provisions and oversight detailed in writing to ensure that this thinning will be conducted to ecological benefit, most likely without roads. I do support some logging in a scientifically managed forest where wildlife comes first and careful silviculture can better improve wildlife habitat”, “I am pleased to see that ecological thinning for forest restoration is included in the agreement, although I have some concerns about how such thinning might be conducted under the agreement.”

#### ***Does Not Support Road Construction Inside Core***

Some comments were against road construction or harvesting timber within the Core Zone, “Construction of new roads should be proscribed without exception for any ecological thinning. The risks of ecological degradation associated with roads would outweigh potential benefits derived from ecological thinning.” Other comments include: “I strongly object to any proposal which leaves any room for road building in the core conservation area!!! If the core conservation area is the sugar that makes the medicine go down let’s not spoil it with the potential of road building”; and “the provision for a couple of new roads in the protected core, which tips the scale (of fairness/balance) too far toward timber harvest. That provision should be removed from the agreement.”

### ***Advocates Designating Core as a NRCA***

Finally, other comments suggested changing the designation of the Core Zone to a NRCA or State Park: “The core certainly deserves the protected status of an [sic] NRCA, a proven tool for effective conservation on DNR-managed lands, yet it appears it’s management and protection are largely undefined.”; and “Given the outstanding values that Blanchard represents and the dire need to protect additional state-managed lands on the mainland of Skagit County, we feel that Blanchard Mountain is an ideal candidate for full protection as an [sic] NRCA or possibly even a State Park.”

### **Roads**

Comments regarding roads included requests to minimize road construction to complete opposition to road construction in the General Management Zone. Those comments included: “no new roads should be constructed”; “no new roads should be undertaken in the 4,800-acre Blanchard Forest site until scientific assessment is completed and presented to we the citizens of Washington State”; “Roads invite crime and totally defeat the feeling of escaping from the city to enjoy natural beauty”; “Roads are very damaging and quite permanent. Road development needs to be as minimal and incremental as possible”; and “No new roads should be constructed on Blanchard Mountain.”

### **Blanchard Forest Advisory Group Formation**

Comments on the Blanchard Forest Advisory Committee included support for having such a committee, volunteers to sit on the committee, and concerns that DNR not appoint members, but rather allow organizations who currently sit on the Strategy Group to select representatives for the Advisory Committee. Some comments endorsed the idea of an advisory committee “I support a standing advisory group would work with DNR’s forest land managers to offer input on proposed timber harvest designs and other activities on Blanchard trust lands into the future.” Volunteers included Concerned Neighbors of Lake Samish and Northwest Paragliding Club. Other suggestions for seats on the Advisory Committee included members of the public, community or neighborhood representatives, non-affiliated professional biologist/ecologist, “representatives from the future park district as well as other conservation organizations such as the Chuckanut Conservancy”, “residents in the Lake Samish, Bow and Edison areas.” Comments requested that the Committee be “broad-based to reflect the changing values of the community and allow for true representative government.”

### **Implementation**

A question was asked whether there would be any review “to make sure that all of the implementations have been properly established and do you have any “Plan B” if your original plans fail?”

## **3. Specific Resource Concerns**

Some comments stated concerns with specific resources in Blanchard Forest, including an Alder wetland, unofficial trail routes, and a particular large cedar.



## **Alder Wetland**

“... And the timber sale currently flagged seems to include a large area of alder wetland. Your map also seems to confirm this. It’s a sensitive area. I hope I’m mistaken. Thank you for going through this process. Please follow through with the recommendations of this group (or with even more trees if possible).”

## **Unofficial Trail Routes**

“While disappointed that more acreage is not protected in the now publicized proposed settlement, I'm concerned that existing unofficial trail routes will not be protected since, as I understand, only the top of Blanchard Hill and some corridors (?) are protected in the proposed settlement. Old trails and tracks that exist along the drainages flowing from the north and west to eventually combined [sic] to enter Oyster Creek somewhat below the south edge of DNR land would be protected with expanded canopy width. Ideally, an enhanced canopy would be extended to include all five categories of the old (?) stream classification...Trail routes exist along all major segments of these creeks and their tributaries, as well as Oyster Creek. The Oyster Creek trail on the east side of the creek extends all the way to the next logging road (the original logging road from Lake Samish that crosses the Chuckanut ridge just beyond Lost Lake, and is a primary east-west route for hiking, biking and horseback riding. The east bank Oyster Creek trail (old logging way) appears to serve as a major segment of the proposed Lost-Lizard Trail, of which DNR agreed to in the Chuckanut Trails Master Plan. Though not in creek canopy protection, the trail proceeds pasts the Oyster Creek cataracts in a area that is marked for logging -Green Drake). I have previously requested that consideration be given to not logging the route in this area. While the Proposed Lost-Lizard trail route climbs to the level of Oyster Creek above the falls and cataracts, one can continue north out of DNR land and on various routes reach the Pine and Cedar Lakes ridge.”

## **Large Cedar**

“Another concern is for the fate of a very large red cedar, perhaps as much as 16 feet around in the proposed U7 Green Drake 'hard [sic] logging' section.”

## **4. Blanchard Forest Strategy Group and Process**

Comments submitted by the public expressed support and criticism for the Blanchard Strategy Group and the collaborative process they underwent to formulate management recommendations for the DNR. As part of this process, the public meeting also drew comments for improving the meeting. Finally other comments provided input on the future of this process.

### **Supports Group and Process**

For those who supported the Group and its process, they described the Group as: “impressive in its balanced composition”; “a collaborative process”; “open and transparent process and fair facilitation”; requiring “hard work”; and “the best way to arrive at a solution.” Some were “heartened to see opposing views working together”. Others described the results of the Group’s work as: “top quality”; producing the “best possible plan”; and “top quality management direction to the benefit of all Washingtonians.”

## **Does Not Support Group and Process**

For those who expressed criticism of the Group and Process, their concerns were that the Group was “hand-picked”, “selected solely by DNR who want to log the area”, that the composition of the Group was “heavily weighed to support timber harvesting” and therefore “short changed” the public’s interest and left many “who felt left out of the final plan”. Others stated that the Group lacked “environmental, wildlife, fisheries, public health, and recreational interest representatives.” Concerns about elements lacking in the Group’s decision-making process included: “full biological disclosure was not made in the strategy process”; “local or scientific input was not examined”; “alternatives were not identified”; and “full disclosure of revenue information” was not made. Others expressed that reconveyance for Blanchard Forest was not discussed.

Suggestions for improvement included a request to include representation for school districts or junior taxing districts.

## **Suggestions for Public Meeting and Request to Change Name of Blanchard Forest**

Some comments provided input on the public meeting. One requested that a meeting be held in Bellingham where the majority of recreationalists live; another critiqued the DNR’s slideshow at the public meeting and its use of Burlington-Edison School District logos and pictures of school buildings. A final member of the public would have liked to see maps that depicted future harvest units on Blanchard. There was a suggestion to change the name of Blanchard Forest to Chuckanut Forest and in many comments Blanchard Forest was referred to as “Blanchard Mountain.”

## **Future Process for Recommendations**

Comments included suggestions for future steps in the process including a request for revisions of the Strategies Group recommendations, based on public comments, “prior to implementation of this plan there needs to be revisions based on the comments received and a public forum for all citizens to express their perspective.”

Others requested that DNR not harvest within the Core or in areas of contention outside of the Core for at least five years to allow for more negotiation over the zoning designations in Blanchard Forest, “If an agreement is adopted, we recommend that the DNR perform no timber management activities in the core area, and refrain from all such activities on the three non-core areas mentioned above for the 5-year lifetime of this current agreement. It is quite possible that during that time period further negotiations, and new funding sources, will lead to these areas being taken out of timber production”; “If the mountain as a whole cannot be protected immediately, citizens should not be denied the opportunity to work for greater protection over the coming years. It is our understanding that DNR intends to begin logging areas that are most in contention first, rather than focus its efforts on areas that many conservationists have been willing to let go in the spirit of compromise. It makes little sense to us why the DNR would want to build new roads and commence logging in the areas we are all most concerned about. Thus we strongly request that all timber harvest activity be delayed for at least five years anywhere within the preferred core areas as proposed under the Sierra Club’s previous petition for an NRCA transfer and for which an assessment was completed.”